

College for Certain, LLC

DRAFT
Operation and Maintenance
Plan for Cap Mitigation
Measures

Former Pacific Electric Motors Site
1009 66th Avenue
Oakland, California
(Fuel Leak Case Number RO0000411)

~~October __, 2014~~  March __, 2013



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Principal Geologist

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Oakland, California
(Fuel Leak Case Number
RO0000411)

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Date:
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1. Operation and Maintenance Overview

1.1 Introduction

On behalf of College for Certain, LLC (CFC), ARCADIS U.S., Inc. (ARCADIS) has prepared this Operation and Maintenance (O&M) Plan for the surface cap ~~remedy~~ installed at the former Pacific Electric Motors (PEM) site located at 1009 66th Avenue, Oakland, California ("the Site"; Figures 1 and 2). The purpose of the surface cap is to mitigate the exposure to soil containing polychlorinated biphenyls (PCBs) at the Site. The surface cap will be in place at the Site in perpetuity while the property is under its current land use. Should the land use change then the land owner will be obligated to contact the U.S. Environmental Protection Agency (U.S. EPA) to present the new land use and plan to mitigate the PCB soil that is present at the Site. This O&M Plan will be incorporated into the Land Use Covenant that is to be placed on the deed for this property. Please note that LFR Inc. (LFR) conducted environmental work at the Site and LFR was incorporated into ARCADIS in December 2008. The legal description of the Site is provided in Appendix A. This O&M Plan includes procedures for:

1. long-term operation, maintenance, and monitoring (inspection) of the engineering controls; and
2. management of soils containing ~~polychlorinated biphenyls (PCBs)~~ at the Site

1.2 Background

Activities conducted at the Site by previous owners and operators of the property resulted in the presence of soil affected by total petroleum hydrocarbons (TPH) as gasoline (TPHg), TPH as diesel (TPHd), TPH as motor oil (TPHmo), arsenic, lead, semivolatile organic compounds (SVOCs), PCBs, and volatile organic compounds (VOCs). The removal action(s) were conducted in accordance with the following two documents:

- Revised Corrective Action Plan, Proposed Aspire High School Site, 1009 66th Avenue, Oakland, California, dated July 17, 2009 ("the revised CAP"; ARCADIS 2009a) and
- Self-Implementing Cleanup Plan ("the SICP") presented in a letter to the U.S. Environmental Protection Agency (U.S. EPA), dated October 23, 2009 (ARCADIS 2009b)

In order to mitigate any exposure to PCB-affected soil that ~~may be~~ is present at the Site, CFC has installed a surface cover across the entire Site consisting of both hardscaped and landscaped areas. Details regarding this cap are provided in Figure 2. The thicknesses of the various elements of the cap were approved by the U.S. EPA in their letters to CFC dated April 5 and June 16, 2011 (U.S. EPA 2011a, and U.S. EPA 2011b).

1.2.1 Revised Corrective Action Plan

The Revised CAP summarized the results of previous investigations, presented the site conceptual model, quantified the baseline risk of chemicals of concern (COCs), developed site-specific risk-based cleanup goals, evaluated potential remedies, and presented an implementation plan for the selected remedies. Remedial activities conducted at the Site included completion of the excavation activities as presented in the Revised CAP (ARCADIS 2009a) and the operation of the soil-vapor extraction/air sparging (SVE/AS) system. The revised CAP was approved by the Alameda County Department of Environmental Health (ACEH) in their letter to Aspire Charter Schools dated August 13, 2009 (ACEH 2009). The implementation of the CAP was reported to ACEH (and U.S. EPA) in the report titled "Soil Removal Action Completion Report, College for Certain, LLC, Former Pacific Electric Motors, 1009 66th Avenue, Oakland, California (Fuel Leak Case No. RO0000411)," dated September 15, 2010 (ARCADIS 2010b).

1.2.2 Self-Implementing Cleanup Plan

To address PCB-affected building materials and soil at the Site, ARCADIS prepared a SICP and submitted the document to the U.S. EPA on October 23, 2009 (ARCADIS 2009b). The SICP received conditional approval from the U.S. EPA in its letter to Aspire dated November 13, 2009 ("Approval Letter"; U.S. EPA 2009a). The conditions provided in the Approval Letter were addressed in a letter transmitted by ARCADIS to the U.S. EPA dated November 18, 2009 (ARCADIS 2009c). The scope of the SICP was further refined in an e-mail message from representatives of the U.S. EPA to ARCADIS dated November 25, 2009 (U.S. EPA 2009b).

The removal of the soil (and building materials) affected by PCBs was documented in a letter report that was prepared in accordance with the Toxic Substance Control Act (TSCA) and transmitted to U.S. EPA on August 13, 2010 ("the TSCA Report"; ARCADIS 2010b) and the addendum to the TSCA report dated March 2013 (ARCADIS 2013a).

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The SICP addressed the following PCB-related issues:

- The demolition of structures and associated infrastructure formerly located on the Site.
- The collection and analysis of additional soil samples and samples of the building materials associated with the former warehouses that were demolished in January 2010.
- The remediation (excavation) of four areas of the Site where PCB-affected soil had been identified through soil samples collected at the Site.

Following the implementation and completion of the SICP activities, ARCADIS prepared a summary letter report documenting the removal of the PCB-affected soil at the Site ("the Summary Report"; ARCADIS 2010a). That report was prepared in accordance with §40 Code of Federal Regulations (CFR) §761.125(c)(5) to describe the implementation of the TSCA SICP at the Site.

As discussed in conference calls and through the exchange of e-mail messages, the analytical results of confirmation soil samples collected at some locations at the Site during the SICP indicate that there are 12 locations where PCB-affected soil at concentrations greater than the cleanup criteria of 0.130 milligram per kilogram (mg/kg) is was still present at the Site after the SICP was completed (ARCADIS 2013a). The locations of the confirmation soil samples that contained PCB-affected soil at concentrations greater than the cleanup criteria are illustrated on Figure 2.

In addition to the confirmation soil samples that failed the cleanup criteria, approximately 10 yards of soil that contained PCBs at concentrations greater than the cleanup criteria was encapsulated on-site at the area of the Site where affected PCBs were already to remain in place at soil sample identifications W1-WSDWall 2' and W2-WSDWall 2', depicted on Figure 2. The encapsulated soil was wrapped in Geotextile fabric and placed at an elevation of approximately 2.5 to 3 feet set to the City of Oakland Vertical Datum, which is equivalent to approximately 5 feet below the surface of the pavement in this area of the Site.

As presented in the Summary Report, the following procedures have been implemented at the Site to ensure that the potential exposure to these soils will be mitigated:

- Installation of a “TSCA cap” across the surface of the Site
- Preparation of a ~~deed notification~~ Land Use Covenant
- Preparation of this O&M Plan

These mitigation measures have been conducted in accordance with 40 CFR 761.61(a)(7) and (8), with some slight modifications approved by representatives of the U.S. EPA (U.S. EPA 2011a,b).

In order to prevent future exposures to the soil at the Site that contains PCBs at concentrations greater than 0.130 mg/kg, a cap consisting of both hardscaped and landscaped areas was installed ~~over site soil~~ over the entire Site. Details regarding this cap are provided on Figure 2. A long-term O&M program is required to monitor and protect the installed cap system to ensure that it continues to provide adequate protection to site users. Intrusive activities, as defined in Section 5.2, are prohibited at the school site unless conducted in accordance with the applicable provisions of this O&M Plan.

1.3 Operation and Maintenance Goal and Objectives

The primary goals of the O&M Plan are: (1) to prevent exposure to the PCB-affected soil; and (2) to protect the health of students, faculty, staff, O&M personnel, and visitors at the school site.

In order to accomplish these goals, the O&M Plan will address the following objectives:

- Minimize disturbances of PCB-containing soils;
- Describe the mitigation remedy, including the installed cap systems;
- Establish an inspection and monitoring program to identify areas of exposed PCB-containing soils or damaged cap system, and evaluate ongoing remedy effectiveness;
- Provide for timely repair or replacement, as needed, to restore damaged cap systems;
- Provide for record-keeping of inspections and repairs, and reporting; and

- Maintain copies of the O&M Plan at the school site.

1.4 O&M Personnel Roles and Responsibilities

CFC will employ and designate the following key O&M personnel responsible for implementing the O&M Plan at the school site: O&M Coordinator; O&M Professional; and School Site Designee. When necessary, the school will employ qualified contractors who will follow the Soil Management Plan (SMP) to perform intrusive work impacting the installed cap system at the school site. The SMP is included as Appendix ~~DB~~.

The names, contact information, and roles and responsibilities of key O&M personnel are included in the following sections.

1.4.1 O&M Coordinator

Mala Batra / Alannah Taylor / [Angela Andrews](#)
Aspire Public Schools
1001 22nd Avenue Suite 100
Oakland, CA 94606
Phone Numbers:
(510) 434-5000 (office)
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Mala.batra@aspirepublicschools.org
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Angela.andrews@aspirepublicschools.org

The responsibilities of the O&M Coordinator are to:

- Implement the O&M Plan;
- Be familiar with site conditions and cap systems installed at the school site;
- Evaluate work orders to determine if work will be intrusive;
- Coordinate the intrusive work;
- Accompany the O&M Professional during annual inspections;

- Submit the O&M Plan and all subsequent reports, including Annual Inspection Summary Reports, Five-Year Review Reports, and Intrusive Work Completion/Incident Reports; and
- Ensure the retention of reports, forms, and records.

1.4.2 O&M Project Professional

The O&M Professional is defined as a California-registered engineer or geologist with expertise in conducting soil investigation and remediation (e.g., an engineer or geologist who is familiar with the cap system installed at the school site). The responsibilities of the O&M Professional are to:

- Conduct annual inspections (including five-year reviews);
- Prepare and sign Annual Inspection Summary Reports and Five-Year Review Reports; and
- Other environmental professional work related to the school site.

1.4.3 School Site Designee

School Principal:
Thomas Kadelbach
College for Certain
1009 66th Avenue
Oakland, CA
Phone: (510) 567-9631
Fax: (510) 632-1569
Thomas.Kadelbach@aspirepublicschools.org

The responsibilities of the School Site Designee are to:

- Ensure that activities that may disturb PCB-containing soils will not be conducted at the school site without the knowledge and approval of the O&M Coordinator; and
- Ensure retention of reports, forms, and records.

2. Site Description

The Site is located on the northwestern side of 66th Avenue between East 14th Street and San Leandro Street (Figures 1 and 2). The legal description of the Site is included as Appendix A. The area around the Site is developed with a mixture of commercial, industrial, government, and multi-family residential buildings. The Site is currently owned by CFC. Additional historical land use information for the Site was presented in the Revised CAP (ARCADIS 2009a).

The first industrial development of the property was in about 1948 when the two buildings were constructed by PEM. PEM occupied the Site from 1948 to 2001. Activities conducted at the Site by PEM included manufacturing specialty magnets, power supplies, and components, and repairing motors, generators, transformers, and magnets. A 2,000-gallon gasoline underground storage tank (UST) was reportedly installed at the Site by PEM in 1975. In addition, the gasoline shed in the fueling area may have stored vehicle lubricants and oil for vehicle maintenance.

The structures that were on the property were demolished between November 2009 and February 2010 and the property was redeveloped into a school between March 2010 and September 2011.

2.1 Previous Site Investigations and Mitigation

PEM removed the 2,000-gallon gasoline UST and associated pump island, piping, storage shed, and appurtenances in 1995. The UST was reportedly in good condition with no holes evident; however, free-phase gasoline product was observed on the water surface in the tank excavation (W.A. Craig 1997). Approximately 1,500 cubic yards of soil were removed in two excavation iterations completed during 1995 and stockpiled on the northern portion of the Site. Approximately 116,000 gallons of petroleum hydrocarbon-affected groundwater were pumped from the excavation. Site investigation work during this time also included drilling GeoProbe borings (between excavation iterations) in an attempt to define the lateral and vertical extent of gasoline constituents. A dewatering sump used during soil excavation was later converted to an 8-inch-diameter well (thought to be WAC-1) during backfilling operations. Backfill reportedly consisted of clean, imported fill material. Reports indicate that the stockpiled excavated soils were disposed of in 1997 (W.A. Craig 1995a, 1995b, 1995c, 1997).

A 30-foot-wide by 70-foot-long by 9-foot-deep excavation for the remediation of petroleum hydrocarbon-affected soils was completed in April 2002 to the south of the

original UST remedial excavation (Decon 2002a,b; Figure 2). Approximately 65,000 gallons of petroleum hydrocarbon-affected groundwater were removed from the excavation. Additional over-excavation was performed southeast of the 30-foot by 70-foot excavation. During backfill operations, an 8-inch-diameter extraction well was installed (EW-1). The excavation was backfilled with an unspecified depth of drain rock. Approximately 250 pounds of oxygen-releasing compound (ORC) slurry were mixed into the gravel fill. Clean, excavated native soil and imported Class II base rock comprised the balance of the backfill. Approximately 219 tons of petroleum hydrocarbon-affected soil were disposed of at an off-site facility (Decon 2002a,b).

In addition, in June 2002, a total of 25 soil borings were advanced to a depth of 13 feet below ground surface (bgs) in the area of the former gasoline UST. Each of these borings was backfilled with 8 pounds of ORC followed by neat cement. ORC socks were also installed in wells MW-1 and WAC-1 (Decon 2002a,b).

2.2 Revised Corrective Action Plan

ARCADIS prepared the Revised CAP for the implementation of site remedies (ARCADIS 2009a). The Revised CAP summarized the results of previous investigations, presented the site conceptual model, quantified the baseline risk of COCs, developed site-specific risk-based cleanup goals, evaluated potential remedies, and presented an implementation plan for the selected remedies.

The Revised CAP recommended excavation and off-site disposal of affected shallow soils with SVE/AS to remediate affected soil, groundwater, and soil vapors (ARCADIS 2009a). The Revised CAP also recommended conducting an extended SVE/AS pilot test including ozone injection, if appropriate.

2.2.1 Soil Excavation and Removal

Between November 2009 and August 2010, soil excavation activities were completed at the Site. This work resulted in the removal of approximately 8,900 tons of affected soil from the Site that was transported to either Waste Management's Kettleman Hills Class I Landfill located in Kettleman City, California or Republic Waste's Vasco Road Class II Landfill located in Livermore, California.

To ensure that the removal activities successfully met the cleanup goals, the 95% upper confidence limit (UCL) of the confirmation soil sample data was calculated for each COC and compared with the respective cleanup goal. The results of this analysis

indicated that concentrations of TPHmo and PCBs remained in soil at the Site at concentrations greater than the cleanup goals. The potential human health risks associated with the presence of PCBs will be mitigated by the installation of the TSCA Cap.

2.3 Post-Mitigation Site Conditions

The newly completed College for Certain School serves grades 6 through 12, with capacity for 570 students, and the school opened in August 2011. The school occupies approximately 1.4 acres and consists of:

- 3 two-story buildings (approximately 41,430 square feet total including 24 full-sized classrooms, 4 labs, 3 girls and 3 boys restrooms, and 4 staff restrooms);
- An asphalt-paved parking area with access via two driveways on 66th Avenue (one for ingress and one for egress);
- An asphalt-paved area for basketball; and
- Several planter areas.

The mitigation measures/engineering controls that comprise the cap systems are illustrated on Figure 2.

3. Summary of Engineering Controls

The remedy described in the TSCA Report was the on-site containment of PCB-containing soil using engineering controls in the form of a cap placed over site soil to prevent or minimize exposures. The cap includes the placement of buildings or other barrier materials including, but not limited to, concrete, asphalt, clean fill, or landscaping. Hardscape and landscape engineering cap systems installed at the school site are summarized on Figure 2 and are described in Sections 3.1 below.

Figure 2 is a site plan showing the mitigation measures/engineering controls that comprise the cap system.

3.1 Hardscape and Landscape Cap Designs

Hardscape and landscape cap systems, as identified in the letter from ARCADIS to EPA entitled "Proposed Toxic Substance Control Act (TSCA) Cap for Pavement Areas – Former Pacific Electric Motors Facility, 1009 66th Avenue, Oakland, California," dated April 25, 2011 (ARCADIS 2011a), and approved by the U.S. EPA in a letter to CFC dated June 16, 2011 (U.S. EPA 2011b), were emplaced across the school site and include: a two-story building, concrete and asphalt paved areas, and an asphalt parking lot. Hardscape cap systems consist of multiple layers of differing materials (i.e., imported base rock and asphalt or concrete).

In the landscaped and planter areas (see Figure 2), the native soil was covered by a minimum of 12 inches of clean fill over cement treated native soil. In accordance with a request from the U.S. EPA, samples of the imported soil were collected and analyzed in accordance with a Soil Sampling Plan (ARCADIS 2011b). The results of these samples indicated that the imported soil met the requirements for imported soil (i.e., were below the cleanup criteria for PCBs, lead, and arsenic). ~~The lab reports for these samples are included as Appendix B.~~

These areas will be properly maintained (i.e., periodically inspected and replenished with additional clean fill, as necessary, to ensure that the cement treated native soil is adequately covered).

4. O&M Inspections

4.1 Periodic Inspections

Periodic inspections of the ~~engineering controls~~cap will be conducted annually, and will be performed by school maintenance staff under the direction of the O&M Coordinator and O&M Professional. ~~To prepare the school maintenance staff the O&M Coordinator and O&M Professional will discuss what to identify and what observations to record during the inspections. To ensure that no control measures are overlooked, a checklist for the specific control measures and their locations must be completed for each inspection. Upon completion, the checklists will be reviewed and signed by the O&M Coordinator (see Appendix C, Inspection Checklist for PCB Engineering Controls). The inspection will include a visual inspection of the cap to identify and locate.~~

~~School employees who are assigned to conduct O&M inspections will be responsible for:~~
~~The key components of the inspection will be to identify the following:~~

1. ~~cracks in the cap measuring greater than 0.25 inches wide and 3 inches long-~~

2. ~~1-~~ identification of any ~~areas of the cap requiring required~~ repairs;

3. ~~(2)~~ documentation of changes in site conditions or usage;

4. ~~(3)~~ description of any on-site construction activities; and/or

5. ~~(4) any other significant~~ **Significant** information related to the effectiveness of the cap. ~~-~~ Examples of such conditions include cracks in caps or sloped areas, soil movement, rivulets, run-on or run-off, and visible bare soil.

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Periodic inspection reports will be maintained at the school site. School employees who conduct periodic inspections will take photographs during each inspection for documentation, as appropriate, to demonstrate stability and/or failure of engineering controls.

The O&M Coordinator will be responsible for follow-up review to ensure that identified repairs are completed on schedule, and will sign-off in the completion blocks of the inspection reports. Copies of periodic inspection reports will be included in the Annual Inspection Summary Reports and Five-Year Reviews.

4.2 Inspections for Unplanned Events

School employees will also conduct inspections of engineering controls immediately following unplanned events (e.g., fires, broken utility lines, floods and/or heavy rain, seismic events) during which caps may be compromised and/or PCB soils may be exposed. "Heavy" rain will be defined as rainfall exceeding 0.50 inches in one hour in Oakland, California. "Significant" seismic events will include those earthquakes occurring nearby, of a magnitude exceeding 5.0 on the Richter scale. The O&M Coordinator will document all inspections and required repairs or maintenance, and incorporate such documents into the Annual Inspection Summary Report.

The O&M Coordinator will notify CFC of any failures (i.e., compromised integrity or possible PCB exposures) of the engineering controls resulting from unplanned events that are not repaired within 14 days of discovery; such notifications will include a proposed schedule for completion of the required repairs and maintenance.

4.3 Annual Inspections

The ~~first~~ annual inspection~~s~~ will be completed in August prior to the beginning of the school year ~~, and all subsequent annual inspections will be completed a week prior to the start of the school year.~~

The O&M Professional will inspect the cap annually. The O&M Coordinator may accompany the O&M Professional during the annual inspection. The purpose of this inspection is to identify and review completion of any required repairs, changes in site conditions or usage, descriptions of any on-site construction activities, or any other significant information related to the PCB engineering controls that may have taken place over the previous twelve months. All annual inspections will include an evaluation of the amounts of clean fill cover remaining in the landscaped areas.

During inspections, all items identified for required maintenance will have a specified action date for completion of the required repairs. The O&M Coordinator is responsible for follow-up review to ensure that identified repairs are completed on schedule, and will sign-off in the completion blocks of the inspection reports. The O&M Coordinator will notify representatives of CFC of any failures of the engineering controls that have not been repaired within 30 days of discovery; such notifications will include a proposed schedule for completion of the required repairs and maintenance.

The Annual Inspection Summary Report will be prepared within 60 days after completion of each annual inspection, in accordance with the reporting requirements specified in Section 6.2 of this O&M Plan.

5. Intrusive Work Activities

O&M personnel will submit all school site construction and maintenance work order requests to the O&M Coordinator. The O&M Coordinator will evaluate, in writing, whether or not the activities described in the work orders are considered “non-PCB intrusive” or “PCB-intrusive”. “PCB-intrusive” activities are prohibited at the school site unless conducted in accordance with applicable provisions of this O&M Plan and the Soil Management Plan; Appendix B. “PCB-intrusive” work includes any construction or maintenance activities that disturb PCB-containing soils, including but not limited to: digging, drilling, excavating, grading, repairing, removing, trenching, filling, gardening, and other soil movement that may penetrate or otherwise compromise the caps in place, thereby opening pathways for possible human exposures to PCB. If work is

determined to be PCB-intrusive, the O&M Coordinator will ensure that work practices are followed as specified in Section 5.2 of this O&M Plan.

5.1 Non-PCB-Intrusive Work

Construction, repair, and/or maintenance activities at the school site are restricted, in accordance with this O&M Plan, only when exposures of PCB-containing soils are reasonably anticipated or when releases occur. "Non-PCB intrusive work" includes construction, repairs, and/or maintenance activities at the school site where exposure of PCB-containing soils is not anticipated, and where the integrity of the engineering controls is not compromised. The following procedures are required when conducting non-PCB intrusive work at the school site:

- The O&M Coordinator will provide information regarding the location of cap systems and soils containing PCB to selected contractors and O&M personnel to minimize the likelihood of PCB intrusion;
- The O&M Professional and/or O&M personnel will conduct inspections during construction and/or maintenance activities at the school site to ensure PCB-containing soils are not being disturbed; and
- In the event that PCB-containing soils are inadvertently disturbed or the integrity of the engineered controls is compromised, the O&M Coordinator will be responsible for implementing the appropriate procedures in accordance with the provisions described in Sections 5.2 and 5.3 of this O&M Plan.

5.2 PCB-Intrusive Work

The following procedures are required by CFC when performing PCB-intrusive construction, repair, and/or maintenance activities to: (1) ensure that safeguards are in place to prevent or minimize PCB exposures to anyone at the school site; (2) prevent untrained or unauthorized personnel from performing intrusive work in PCB areas; and (3) restore the integrity of the in place engineering controls if they are impaired or compromised by such activities. The O&M Coordinator will oversee these procedures for all PCB-intrusive work (as defined in Section 5 of this O&M Plan) performed by, or on behalf of, CFC at the school site:

- Provide information regarding the location of the cap systems, cross-section construction details, and locations of all soils containing PCB to selected contractors;
- Verify that selected contractors and their employees will comply with federal and state OSHA requirements;
- Require that construction and maintenance work be performed in such a manner to meet or exceed the existing cap conditions;
- Evaluate timelines, school, and work schedules to ensure that PCB-intrusive work is completed as soon as possible to minimize exposure risks;
- Require reasonable restrictions to school site access to reduce exposures to non-workers;
- Implement dust control practices that utilize water;
- Manage any PCB-containing or impacted soils brought to the surface in accordance with the Soil Management Plan (see Appendix [DB](#)), and in compliance with applicable, relevant, and appropriate provisions of state and federal law; and
- Comply with all applicable, relevant, and appropriate federal, state, and local requirements.

5.3 Standard Cap Repair

Whenever possible, PCB-intrusive construction or maintenance work activities will be conducted to meet or exceed the existing cap conditions (see Figure 2).

The procedures to be followed during PCB-intrusive work include the following:

- Stabilization of site;
- Limitation on site access, as appropriate;
- Management of excavated soils, including dust control, work site access, and soil segregation;

- Cap repair, or fill replacement procedures, to match the existing cap conditions; and
- Evaluation and use of new fill materials.

6. Reporting and Record-Keeping

6.1 Reporting Requirements

The O&M Coordinator will maintain records of training provided to O&M personnel, compile appropriate information, develop, and file the following reports at the school site in a timely manner:

- Annual Inspection Summary Reports
- Completion Reports for PCB-intrusive work
- Five-Year Review Reports

6.2 Annual Inspection Summary Reports

Annual Inspection Summary Reports will summarize the findings from annual inspections, and will document completions, delays, or failures to repair any items identified as needing repairs. The Annual Inspection Summary Report will be signed by the O&M Professional and O&M Coordinator, and will be completed no later than 60 calendar days after the annual inspection has been conducted. Annual Inspection Summary Reports will follow the format outlined in Appendix E, and will be included and maintained in files at the school site.

Annual Inspection Summary Reports will include the following:

- Copies and a summary of the signed periodic inspection checklists completed since preparation of the previous Annual Inspection Summary Report;
- Results of the annual visual inspection, including measurements and an evaluation of the conditions and amounts of cap materials remaining over the geotextile/PCB soil, and if necessary, analytical sampling data and analyses;

- A description of actions taken since completion of the previous O&M annual inspection, including:
 - Any repairs to the installed cap remedy that were identified and carried out;
 - Any significant changes in site conditions or usage (e.g., paving, grading, utility trenching, playgrounds, or picnic areas); and
 - Any additional on-site construction or other significant information that may impact the installed cap remedy (e.g., installation of portable buildings or maintenance facilities);
- A description of any maintenance or repairs identified as needed during the O&M annual inspection;
- A description of any recommendations for O&M Plan modification;
- A description of actions planned or expected to be undertaken before the next O&M annual inspection that will impact the in place engineering controls;
- Recommendations concerning any repairs to the installed caps that are still needed;
- Photographs depicting site conditions with brief identifying captions or descriptions
 - During the annual inspection, the O&M Professional will take photographs for documentation, as appropriate, to demonstrate stability and/or failure of engineering controls;
- Conclusions regarding the ongoing effectiveness of the cap systems; and
- Documentation of any additional PCB investigation, monitoring, and/or mitigation activities.

6.3 Completion Reports for PCB-Intrusive Work

Within 60 days of completion, PCB-intrusive work activities will be documented in a Completion Report prepared by the O&M Professional. Each Completion Report will include the following information:

- Date work was performed;

- Work location, with maps and figures;
- Work activities performed, including restoration of cap systems where necessary;
- Work practices taken to prevent potential exposures;
- Variance or modifications (if any) of the existing cap conditions; and
- Summary of finished site conditions.

The O&M Professional will incorporate all Completion Reports for PCB-intrusive work conducted during the year into the Annual Inspection Summary Report. The format for Completion Reports will follow the outline provided in Appendix F.

6.4 Five-Year Review Reports

Five-Year Reviews will be conducted to evaluate ongoing remedy effectiveness where PCB-affected soil remains in place. The purpose of five-year reviews is to determine whether the remedy: (1) remains protective of human health and the environment; (2) is functioning as designed; and (3) is maintained appropriately by O&M activities. Each Five-Year Review will be conducted by the O&M Professional, who will prepare and sign the Five Year Review report, following the outline in Appendix G.

All engineering controls will be inspected by the O&M Professional in the same manner used during the annual inspection (see Section 6.2). The purpose of the five-year inspection is to identify and review completion of any required repairs, changes in site conditions or usage, descriptions of any on-site construction activities, or any other significant information related to the engineering controls that may have taken place over the previous five years.

6.5 Record-Keeping and Retention

All documentation records (e.g., data, reports) prepared under this O&M Plan will be maintained by the O&M Coordinator at the school site. The records will include, but are not limited to:

- Periodic inspection checklists, Annual Inspection Summary Reports, Five-Year Review Reports, Completion Reports for PCB-intrusive work, and photographs associated with all of the above;

- Records of public inquiries for information about PCB at the school site; and
- Investigation and mitigation documents (e.g., the Combined Environmental Mitigation Plan and Cap Completion Report).

All records will be preserved by the O&M Coordinator for a minimum of five years after the conclusion of each relevant activity.

Due to the significant volume of paper that could be generated, the O&M Coordinator may elect to maintain paper copies of reports from the most recent 12 months and the latest five-year review report, if applicable, and preserve the rest as electronic files.

7. Site Access

At all reasonable times and upon request, the O&M Coordinator will arrange for O&M personnel to have access to the school site. During intrusive activities, access to the work area will be limited by the placement of temporary fencing around the work area.

8. Variance, Modification, or Termination of the O&M Plan

The O&M Coordinator may seek variance, modification, and/or termination of this O&M Plan at any time during the life cycle of the cap remedy. "Variance" refers to possible release from specific individual O&M Plan requirements for a limited time period, while "modification" refers to the permanent revision of specific requirements. Variance, modification, or termination of the O&M Plan may be allowed if:

- Such variance, modification, or termination is protective of public health and safety and the environment.

8.1 O&M Plan Modifications

When long-term performance of the cap remedy has been confirmed, the O&M Coordinator may seek to modify the requirements of the O&M Plan based on site-specific monitoring results and/or conditions. O&M Plan modifications may include the following:

- Changes in the frequency of O&M activities;

- Modification, replacement, or addition of components to the O&M Plan if O&M activities fail to achieve the objectives of protecting public health, safety, and the environment; and/or
- Evaluation, design, construction, and/or operation of additional remedial measures to achieve the O&M objectives.

8.2 Termination of O&M Plan

Based on review of a Five-Year Review report or a subsequent Annual Inspection Summary Report, CFC may determine whether the cap remedy has met either of the following performance criteria required for termination of O&M activities:

- Availability of new scientific information resulting in changes or modifications to the U.S. EPA's technical criteria for evaluating unacceptable risk levels for PCB in soils; and/or
- Change in land use (i.e., the school site is no longer used as an educational facility).

Prior to the sale, lease, or sublease of the school site, or any portion thereof, the O&M Coordinator will provide the buyer, lessee, or sub-lessee with notice that PCB-containing soils are located on or beneath the school site.

Because caps are not anticipated to have any adverse impacts on building foundation systems or other components, removal and/or decommissioning of the caps following termination of the O&M activities will not be required.

9. References

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ARCADIS U.S., Inc. (ARCADIS). 2009a. Revised Corrective Action Plan, Proposed Aspire High School Site, 1009 66th Avenue, Oakland, California. July 17.

- . 2009b. Toxic Substance Control Act Self-Implementing Cleanup Notification and Certification Former Pacific Electric Motors Facility 1009 66th Avenue in Oakland, California. October 23.
- . 2009c. Conditional Approval of the Toxic Substance Control Act Self-Implementing Cleanup Notification and Certification, Former Pacific Electric Motors Facility, 1009 66th Avenue in Oakland, California. November 18.
- . 2010a. Implementation of the Toxic Substances Control Act Self-Implementing Cleanup Notification at the Former Pacific Electric Motors Facility, 1009 66th Avenue, Oakland, California. August 12.
- . 2010b. Soil Removal Action Completion Report, College for Certain, LLC, Former Pacific Electric Motors, 1009 66th Avenue, Oakland, California (Fuel Leak Case No. RO0000411). September 15.
- . 2011a. Proposed Toxic Substance Control Act (TSCA) Cap for Pavement Areas – Former Pacific Electric Motors Facility, 1009 66th Avenue, Oakland, California. April 25.
- . 2011b. Soil Sampling Plan for Soil to be Imported for Use in the Proposed Landscaped Areas at the Former Pacific Electric Motors Facility, 1009 66th Avenue, in Oakland, California. June 11.
- . 2013a. Addendum to Implementation of the Toxic Substances Control Act Self-Implementing Cleanup Notification at the Former Pacific Electric Motors Facility, 1009 66th Avenue, Oakland, California. March.
- . 2013b. Soil Management Plan for Soil for the Former Pacific Electric Motors Facility, 1009 66th Avenue, in Oakland, California. March.
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- . 2002b. Remediation Project Report – Addendum for Pacific Electric Motor Co., 1009 66th Avenue, Oakland, CA 94612. October 2.
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Cleanup Notification and Certification Former Pacific Electric Motors Facility 1009 66th Avenue in Oakland, California." November 13.

- . 2009b. U.S. EPA. Email Message from Carmen Santos to Ron Goloubow;
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of SAP and LFR's November 18, 2009 Letter. November 25.
- . 2011a. Aspire Public Schools 1009 66th Avenue, Oakland, California U.S. EPA
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Toxic Substances Control Act New request for Additional Cap Modifications. April
5.
- . 2011b. Aspire Public Schools 1009 66th Avenue, Oakland, California U.S. EPA
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Toxic Substances Control Act New request for Additional Cap Modifications. June
16.
- W.A. Craig, Inc. 1995a. Final Closure Plan for Underground Storage Tank Removal for
Pacific Electric Motor Co., 1009 66th Avenue, Oakland, CA 94621. March 14.
- . 1995b. Correspondence to ACDEH via facsimile. Attached soil and water
sample results, and next phase of work due to contamination in the soil and pit
water. March 31.
- . 1995c. Subsurface Environmental Investigation for Pacific Motor Co., 1009
66th Avenue, Oakland, CA 94621. May 16.
- . 1997. Excavation and Sampling Report for Pacific Electric Motor Co., 1009
66th Avenue, Oakland, CA 94621. May 12.



| **Appendix B**

Legal Description



Appendix B

Laboratory Reports for Imported Soil



Appendix B

Inspection Checklist for Engineering
Controls



Appendix B

Soil Management Plan



Appendix B

Annual Inspection Summary Report
Outline



| **Appendix B**

Compliance Report Outline



| **Appendix B**

Five-Year Review Report Outline